UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

Charlotte Loquasto, et al.	§	
	§	
Plaintiffs,	§	Civil Action No. 3:19-CV-01455-B
	§	
VS.	§	(Consolidated with
	§	Civil Action No. 3:19-CV-01624-B)
Fluor Corporation, Inc., et al.	§	
	§	
Defendants.	§	
	§	

ALLIANCE PROJECT SERVICES, INC.'S JOINDER TO THE FLUOR DEFENDANTS' RESPONSE TO PLAINTIFFS' OPPOSED MOTION FOR JURISDICTIONAL DISCOVERY AND EXTENSION OF TIME TO RESPOND REGARDING THE FLUOR DEFENDANTS' RULE 12(H)(3) MOTION TO DISMISS UNDER POLITICAL QUESTION DOCTRINE

Defendant Alliance Project Services, Inc. ("APS") joins the Response of Defendants Fluor Corporation, Inc., Fluor Enterprises, Inc., Fluor Intercontinental, Inc., and Fluor Government Group, Inc. (collectively, the "Fluor Defendants") [Dkt. No. 33] to Plaintiffs' Opposed Motion for Jurisdictional Discovery and Extension of Time to Respond Regarding the Fluor Defendants' Rule 12(h)(3) Motion to Dismiss under Political Question Doctrine [Dkt. No. 28] ("Plaintiffs' Motion for Jurisdictional Discovery").

For the reasons set forth in the Fluor Defendants' Response, the Court should deny Plaintiffs' Motion for Jurisdictional Discovery.

Respectfully submitted,

FOX ROTHSCHILD LLP

By: /s/ David Grant Crooks
C. Dunham Biles
State Bar No. 24042407
David Grant Crooks
State Bar No. 24028168
Two Lincoln Centre
5420 LBJ Freeway, Suite 1200
Dallas, Texas 75240
972-991-0889 – Phone
972-404-0516 – Fax
cbiles@foxrothschild.com
dcrooks@foxrothschild.com

-AND-

Kathy S. Kimmel, (Admitted *Pro Hac Vice*) Fox Rothschild, LLP 222 South Ninth Street, Suite 2000 Minneapolis, Minnesota 55402 612-607-7306 – Phone 612-607-7100 – Fax kkimmel@foxrothschild.com

Attorneys for Alliance Project Services, Inc.

CERTIFICATE OF SERVICE

I certify that on this 8^{th} day of October 2019, a true and correct copy of the foregoing document was served on counsel of record for the parties in accordance with the Federal Rules of Civil Procedure.

/s/ David Grant Crooks
David Grant Crooks